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MEMO ENDORSED

November 18, 2021

TO: Hon. Kenneth M. Karas
United States District Court
United States Courthouse
300 Quarropas Street, Chambers 533
White Plains, NY 10601-4150

RE: *United States v. Anupam Biswas, 18 Cr. 604 (KMK)*

Dear Judge Karas,

This letter is submitted on behalf of defendant Anupam Biswas, to respectfully ask this Court to reconsider the prior decision, dated November 17, 2021, commanding that Mr. Biswas surrender on November 18, 2021 and allow him several days to better prepare for his five-year sentence.

As this Court is aware, on the date of sentencing, the defense asked that Mr. Biswas be permitted to remain out with a voluntary surrender date. The defense had hoped that he would be designated at the time of his turn in. The Court allowed for Mr. Biswas to remain at liberty and no specific surrender date was set at that time. The defense assumed, incorrectly, that the defense, client and pre-trial would be contacted as to the date of surrender. Defense's understanding now is that defense should have reached out to this Court to find out a date of surrender. For that, we deeply apologize.

In mid-November, Mr. Biswas reached out to defense to ask if he could visit with his family for November 25 and November 26. As the defense was unaware that the Court had set a surrender date for November 14, 2021, the defense reached out to pre-trial and AUSA Marcia Cohen. Both consented to said travel as long as this Court consented.

After writing a request to travel letter, defense attempted to put the letter into the ECF system, but the letter would not go through. The next day, Leo Barrios contacted defense to let defense know that Mr. Biswas was supposed to turn himself in on November 14, 2021 but suggested that defense should submit the original travel letter, believing this Court would extend the date for surrender.

After indicating to Mr. Barrios that defense was having an issue with ECF, Mr. Barrios suggested we provide him with the letter that he would forward on to this Court. Defense then submitted said letter to Mr. Barrios.

After the Court's decision denying the travel request, defense received a call from pre-trial in New Jersey, raising concerns about Mr. Biswas being prepared mentally with such short notice and concerns about his ability to close out his bank account/his vehicle and other personal matters.


Defense understands that it was defense's obligation to reach out to find out a surrender date and again apologizes to this Court. Defense's request is that as Mr. Biswas had nothing to do with the failure of the defense to reach out and was unaware of the defense's obligations, he be provided several days to get his affairs in order.

Thank you in advance.

Sincerely,
_s/ Julie Rendelman
Julie Rendelman, ESQ.
Attorney for Defendant Anupam Biswas

cc: Marcia S. Cohen, Assistant U.S. Attorney (email)

Granted. The new surrender date
is 12/3/21 at noon,

S. O. P. S.

11/18/21